

**THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

<b>IN RE:</b>	§	<b>CHAPTER 11</b>
	§	
<b>GTL (USA), INC.</b>	§	<b>CASE NO. 15-40248</b>
	§	
<b>Debtor.</b>	§	
	§	

**JOINDER OF INFORMAGE SQN TECHNOLOGIES, LLC, TO THE OBJECTION OF  
THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS OF GTL (USA), INC.,  
TO THE DISCLOSURE STATEMENT IN RESPECT OF CHAPTER 11 PLAN OF  
REORGANIZATION OF GTL (USA), INC., AND RESERVATION OF RIGHTS**

Informage SQN Technologies, LLC (“SQN”), by and through its undersigned counsel, hereby joins (“Joinder”) in the Objection of the Official Committee of Unsecured Creditors of GTL (USA), Inc. (“UCC Objection”) to the Disclosure Statement in Respect of Chapter 11 Plan of Reorganization (“Plan”) for GTL (USA), Inc. (Docket No. 237) (the “Disclosure Statement”). In support of the Joinder, SQN respectfully represents as follows:

**BACKGROUND**

**A. The Bankruptcy Case**

1. On February 9, 2015 (the "Petition Date"), GTL (USA), Inc. (the "Debtor") filed its voluntary petition for relief under title 11, chapter 11 of the United States Code (the "Bankruptcy Code"). The Debtor continues to operate its business as debtor-in-possession pursuant to Bankruptcy Code §§ 1107 and 1108. No trustee or examiner has been appointed.
2. On March 6, 2015, the United States Trustee appointed the Committee.
3. On June 8, 2015, the Debtor filed its Disclosure Statement (Doc. No. 162) and its Plan (Doc. No. 161).

4. A hearing is currently set for approval of the Disclosure Statement on July 28, 2015 at 1:30 p.m. (the "Disclosure Statement Hearing").

**B. The Sale Motion**

5. On July 17, 2015, the Debtor filed its Expedited Motion for an Order (I) Approving Settlements and Dismissal of the Case, or, in the Alternative, (II) Approving Procedures for the Sale of Substantially all of Debtor's Assets, (a) the Approval of Bid Procedures, (b) Assumption and Assignment of Certain Executory Contracts and Unexpired Leases, (c) Establishing Cure Amounts, (d) Approving the Forms of Notice, (e) Setting Hearing Dates, and (III) Granting Related Relief (Doc. No. 228) (the "Sale Motion").

6. As set forth in the Sale Motion:

The Plan provides for the continued operation of the business with post-petition funding to be provided, on an as needed basis, from the Debtor's parent, GTL International ("GTLI") and/or GTL, Ltd. ("GTLL"), the ultimate parent (together, the "Parents") . . . After the Plan was filed, the Parents advised the Debtor that, due to their economic circumstances, they could not provide postconfirmation financing to the Debtor on the terms and conditions previously proposed.

Sale Motion at ¶¶ 7-8. As stated in the UCC Objection, "[t]his is consistent with evidence otherwise adduced by the UCC in this case. Specifically, that the Parents' funding of the Debtor is critical to its long-term survival and that the Parents are unable to further provide such funding in the foreseeable future." UCC Objection at ¶¶ 6.

7. On July 17, 2015, the Debtor also filed a separate motion seeking to have the Sale Motion heard on an expedited basis (Doc. No. 229) (the "Motion to Expedite"). As set forth in the Motion to Expedite:

The Debtor's business operations are at a seasonal phase that will result in a cash drop as much as \$1.0 MM over the upcoming weeks. While the Debtor believes that its cash reserves will recover in the fall, the near and long-term ability of the Debtor to secure financing to weather its slow season and operate profitably going forward is uncertain at

best. As such, it is a possibility that the Debtor will find itself without sufficient cash resources to operate as soon as August or September of this year.

Motion to Expedite at ¶ 6.

8. On July 21, 2015, the Court entered an order granting the Motion to Expedite and setting a hearing on the sale procedures for July 30, 2015 at 1:30 p.m.

### **JOINDER**

9. For the reasons set forth in the UCC Objection to the Disclosure Statement, SQN objects to the Disclosure Statement.

### **RESERVATION OF RIGHTS**

10. SQN expressly reserves its right to further object to the Disclosure Statement and raise additional arguments at any hearing to consider the Disclosure Statement.

### **CONCLUSION**

**WHEREFORE**, in consideration of this Joinder and the UCC Objection, SQN respectfully requests that this Court enter an order denying approval of the Disclosure Statement, and granting SQN any and all relief as this Court deems just and proper.

Dated: July 23, 2015

**Respectfully Submitted,**

PADFIELD & STOUT, L.L.P.  
421 West Third Street, Suite 910  
Fort Worth, Texas 76102 – 3751  
817-338-1616 phone  
817-338-1610 fax

/s/ Mark W. Stout

Mark W. Stout  
State Bar I.D. #24008096  
[ms@livepad.com](mailto:ms@livepad.com)

*ATTORNEYS FOR SQN*